



PILLSBURY WINTHROP

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October 2, 2002

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VIA FACSIMILE

Karen Getman, Chairman
Commissioners Downey, Knox and Swanson
Fair Political Practices Commission
428 J Street, Suite 620
Sacramento, CA 95814

Re: Petition to Reconsider Regulation 18531.7 - Payments for
Communications to Members, Employees and Shareholders

Dear Chairman Getman and Commissioners

In my letter of September 3, 2002, I wrote in support of the petition to reconsider portions of Regulation 18531.7, which implements the provisions of Government Code section 85312. I also testified on this matter at the September 5th Commission meeting. My prior letter and testimony focused on the following issues:

The inclusion of payments made "at the behest" of a candidate in the exception established for communications to members, employees and shareholders in Government Code section 85312; and

2. The ability of an organization to use its sponsored PAC to communicate with its members, employees and shareholders, pursuant to Government Code section 85312.

I support your staff's recommendations concerning the adoption of regulatory language addressing these two issues. Thank you for your willingness to consider revisions to the proposed regulation.



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Please do not hesitate to contact me if you have any questions concerning this letter.

Very truly yours,

A handwritten signature in cursive script that reads "Kathryn E. Donovan".

Kathryn E. Donovan

cc: C. Scott Tocher, Esq.
Luisa Menchaca, Esq.